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14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 THOMAS DAWSON REUTER and
17 DULCE VICTORIA GALINDO FELIX,

18 Plaintiff,

19 v.

20 ANTONY BLINKEN, U.S. Secretary of
21 State; ERIC S. COHAN, Consul General,
22 U.S. Consulate in Ciudad Juarez, Mexico;
23 ALEJANDRO MAYORKAS, Secretary of
24 U.S. Department of Homeland Security;
25 MERRICK B. GARLAND, U.S. Attorney
26 General, in their Office Capacities,

27 Defendants.

28 Case No. 2:20-cv-02180-JCM-BNW

29 **Stipulation and Order for Extension
30 of Time**

31 **(First Request)**

32 Plaintiffs Thomas Dawson Reuter and Dulce Victoria Galindo Felix, and
33 Defendants Antony Blinken, U.S. Secretary of State; Eric S. Cohan, Consul General, U.S.
34 Consulate in Ciudad Juarez, Mexico; Alejandro Mayorkas, Secretary of U.S. Department of
35 Homeland Security; and Merrick Garland, U.S. Attorney General (“Defendants”) hereby
36 stipulate and agree that Defendants may have a 30-day extension of time, from September
37 14, 2021 to October 14, 2021, to reply to Plaintiff’s Response in Opposition to Defendants’
38 Motion to Dismiss (ECF No. 31).

1 An extension is needed because defense counsel only recently learned she will need
2 to undergo a medical procedure that will require at least two and a half weeks of recovery.
3 Under the circumstances, good cause exists to extend the time for Defendants to reply to
4 Plaintiff's Response in Opposition to Defendants' Motion to Dismiss. *See* Fed. R. Civ. P.
5 6(b)(1)(A) ("When an act may or must be done within a specified time, the court may, *for*
6 *good cause*, extend the time...with or without motion or notice if the court acts, or if a request
7 is made, before the original time or its extension expires[.]") (emphasis added).

8 This is Defendants' first request for an extension of time. *See* LR IA 6-1(a) (must
9 advise of previous extensions). Defense counsel contacted Plaintiff's counsel regarding this
10 extension request, and he has advised that he does not oppose the request. This stipulation
11 is made in good faith and not for the purpose of undue delay.

12 Dated: September 9, 2021.

13 LAW OFFICE OF FELIPE D.J.
14 MILLAN, P.C.

15 /s/ Felipe D.J. Millan
16 FELIPE D.J. MILLAN
17 Attorney for Plaintiffs

18 DATED: September 9, 2021

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Holly A. Vance
HOLLY A. VANCE
Assistant United States Attorney

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE